

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
2:12-cv-02040-JAD-PAL

CRYSTAL L. COX,  
Defendant, Counter Plaintiff

v.

MARC J. RANDAZZA,  
Plaintiffs, Counter Defendant

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APR - 9 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

Motion in Limine  
to Include Exhibit 23

Jordan Rushie / Philly Law Blog

Exhibit 23 is a blog post from an attorney blog, one of the blogs Randazza used as exhibits in this court to steal Cox's Domain names in an unconstitutional TRO, and Randazza used in his WIPO complaints and elsewhere to prove Cox was an extortionist. Knowing full well that Rushie had worked with Randazza and had posted the false and defamatory statements of fact in which Randazza told him.

Randazza and Rushie worked on many cases together. And now Jordan Rushie is an attorney with Randazza Legal Group.

Cox moves this court to include Exhibit 23 in her counterclaim against randazza to prove defamation and malpractice.



Crystal L. Cox, Pro Se  
Counter Plaintiff / Defendant



**Certification of Service**

On April 7, 2015, Crystal Cox certifies mailing a copy of this to:

U.S. District Court  
Clerk of Court  
Room 1334  
333 Las Vegas Blvd. S.  
Las Vegas , NV 89101

A handwritten signature in black ink, appearing to read "Crystal Cox", is written over the address text.

# Philly Law Blog

Represent

## Crystal Cox – Investigative Blogger? No, More Like A Scammer and Extortionist



([http://phillylawblog.files.wordpress.com/2012/03/img\\_33315\\_crystal-cox-screwed-by-oregon-judge.jpg](http://phillylawblog.files.wordpress.com/2012/03/img_33315_crystal-cox-screwed-by-oregon-judge.jpg))

Crystal Cox: "Pay me \$2,500 a month and I won't write false crap about you, call your wife a slut, and go after your 3 year old daughter on the internet! STRAIGHT CASH HOMIE!"

Imagine this... you Google yourself. To your surprise, a whole bunch of stuff that is blatantly untrue comes up. Being an adult, you call the person who wrote it. This is how the conversation goes down:

"Did you write all that stuff on a website about me?"

"Yup. I'm an investigative blogger journalist!"

"Um, a bunch of the stuff you wrote about me is untrue. Actually all of it is."

"Oh sure, I know. But I'm a journalist blogger so I can say whatever I want. First Amendment, bitch! But tell you what – I'm also reputation manager. If you pay me \$2,500 a month, I'm sure a lot of that untrue stuff would go away."

"Uhhhhh... wait a second. You wrote a bunch of stuff that's untrue about me. And now you'll only take it down if I pay you?"

"Yup! And if you DON'T pay me it's going to get worse! I'm going to buy a bunch of domain names that involve you and your family. Not only will I smear your reputation, but I'll smear theirs, too! I'll write all kinds of stuff, like call your wife a slut! I'll even go after your four year old child!"

"That's extortion!"

"No silly, it's not extortion! It's journalism! Investigative journalism!"

You're probably saying to yourself "nah, that couldn't happen. That's illegal. A person could get in a lot of trouble for doing something so irresponsible and probably illegal."

Too bad that's exactly what Crystal Cox did (<http://randazza.wordpress.com/2012/03/30/judge-rules-again-that-blogger-crystal-cox-is-not-a-journalist-you-know-why-because-she-isnt-a-journalist/>). Twice now. Maybe more.

You may remember Crystal Cox. Crystal Cox became newsworthy when a jury awarded Kevin Padrick a \$2.5m judgment (<http://abcnews.go.com/blogs/business/2011/12/blogger-crystal-cox-is-no-journalist-must-pay-2-5m-in-damages-says-judge/>) against her. Cox claimed to be an "investigative blogger / journalist" whose goal was to expose Obsidian Finance Group and its president. Kevin Padrick sued her for defamation and won. According to some media reports, the judge had ruled "bloggers are not journalists."

Now, at first, it sounds bad – a financial company going up against poor little blogger who just wants to expose the truth. I can get on board with that. When I first heard about the story, I was kind of outraged. Sure, I'm not a "journalist", but my blog deserves protection under the First Amendment.

But let's dig a little deeper, shall we...?

First off, juries don't typically award corporations huge verdicts unless there is a good reason. That right there is a sign that things are perhaps not as they appear to be at first glance.

So why did a jury see it fit to award \$2.5m in damages against Crystal Cox? And why weren't her posts protected by the First Amendment?

EXHIBIT 23

According to Scott Greenfield (<http://blog.simplejustice.us/2012/03/30/a-blogger-not-like-us.aspx>), the judge found Crystal Cox was not a journalist because:

[T]he uncontroverted evidence at trial was that after receiving a demand to stop posting what plaintiffs believed to be false and defamatory materials on several websites, including allegations that Padrick had committed tax fraud, defendant offered 'PR,' 'search engine management,' and online reputation repair services to Obsidian Finance, for a price of \$2,500 per month," Hernandez wrote.

The suggestion was that defendant offered to repair the very damage she caused for a small but tasteful monthly fee. This feature, along with the absence of other media features, led me to conclude that defendant was not media.

Here is the Court's opinion in its entirety (<http://ia700403.us.archive.org/9/items/gov.uscourts.ord.101036/gov.uscourts.ord.101036.123.0.pdf>).

Right. Crystal Cox basically posted a bunch of stuff that was untrue and then offered to take it down for a monthly fee of \$2,500. (which is like, 5x more than my office costs a month and 100x more than is in my bank account). This is the email Cox sent to Padrick's lawyer:

**David Arman**

From: Crystal L. Cox [mailto:[lawyercox@crystal.com](mailto:lawyercox@crystal.com)]  
Sent: Wednesday, January 18, 2011 2:23 PM  
To: David Arman  
Subject: From Crystal L. Cox

Hello David, I hope this email finds you doing well. All said and done, looks like Summit boys going to jail, and Well I don't think that Kevin acted with the Highest of Integrity. however at this Point in my Life it is Time to Think of Me

So I want to let you know and Obsidian Finance that I am now offering PR Services and Search Engine Management Services starting at \$2500 a month to promote Law Firms, Finance Companies, and to protect online reputations and promote businesses.

Please Let me know if Toolson Corp or Obsidian Finance is interested in this service.

thanks for your time.



Crystal L. Cox  
Investigative Blogger  
Not Quite Another Doctor.

(<http://phillylawblog.files.wordpress.com/2012/03/coxreputationmanagementoffer-480x315.jpg>)

Exhibit 23

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Crystal Cox – Investigative Blogger? No. More Like A Scammer and Extortionist | Philly Law Blog

Presumably, this kind of extortion pissed off a jury, who entered a \$2.5m verdict against her. That's more than many disabled people get in personal injury lawsuits – just ask Max Kennerly (<http://www.litigationandtrial.com/>). A verdict like that suggests she caused Kevin Padrick and Obsidian some serious damage.

Just one problem — Crystal Cox decided to try her same scam. *Again*. And to Marc Randazza (<http://www.randazza.com>). And then to his wife and 3 year old daughter when it didn't work.

Apparently Cox approached First Amendment Badass Marc Randazza (<http://www.popehat.com/2012/03/15/marc-randazza-first-amendment-badass/>) to appeal the judgment and apparently Crystal Cox and Randazza discussed representation at some point. (<http://randazza.wordpress.com/2012/03/30/judge-rules-again-that-blogger-crystal-cox-is-not-a-journalist-you-know-why-because-she-isnt-a-journalist/>)

The representation fell through for whatever reason. Two months after the representation fell through, Cox went and registered “marcandazza.com”, allegedly to control the PR on the case.

And of course, when she bought the domain, she reminded Marc that she offers “reputation management” services, for a fee, of course:

Subject: from Crystal L. Cox  
From: "Crystal L. Cox" <crystalcoxbroker@yahoo.com>  
Date: Mon, January 16, 2012 2:30 pm  
To: "mjr@randazza.com" <mjr@randazza.com>

Hi Marc, hope this email finds you doing well. When I thought we may work together I bought <http://www.marcandazza.com/> - to control the search, and pr on my case, if you represented me.. I manage it now, as ownership is well.. a different story now due to my current judgement..

I am confident with the case, and leaving it to the highest and best good..

I do however need to make money, so I am asking you if you or anyone you know could use a very good search engine reputation manager. Not sure if you ever researched that for your online presence.. not sure of what you think of David Arman exposing me of extortion, thing is search management is something tons of people due and for thousands a month per search term.. and so when he sent a cease and desist and filed a lawsuit, I offered it as a way to settle and not spend a year fighting, he turned it down, then a year later accused me of a crime.. its simply not how it happened..

Anyway if you know anyone needing a very good search engine reputation manager please let me know..

Crystal L. Cox  
Broker Owner

(<http://phillylawblog.files.wordpress.com/2012/03/coxtorandazzaemail.png>)

Marc said “No thanks. That’s not very cool.” (Cox posted all their emails on her website, which is how I learned this.)

Cox went on to register:

<http://phillylawblog.wordpress.com/2012/03/30/crystal-cox-investigative-blogger-no-more-like-a-scammer-and-extortionist/>

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fuckmarcandazza.com  
marcandazzasucks.com  
marcjrandazza.com  
marcjohrandazza.com

Crystal Cox also registered a great many Blogger accounts with Marc's name, including markrandazza.blogspot.com.

Too bad it didn't work. Randazza had a little too much Google juice ([https://www.google.com/webhp?rlz=1C1TSNF\\_enUS419US419&sourceid=chrome-instant&ie=UTF-8&ion=1#hl=en&sugexp=frglb&gs\\_nf=1&tok=gIDcolP0S28-Mvznl\\_n7vm5w&cp=13&gs\\_id=2&xhr=t&q=marc+randazza&pf=p&scient=psy-ab&rlz=1C1TSNF\\_enUS419US419&site=webhp&source=hp&oq=marc+randazza&aq=&aqi=&aql=&gs\\_l=&pbx=1&bav=on.2.or.r\\_gc.r\\_f](https://www.google.com/webhp?rlz=1C1TSNF_enUS419US419&sourceid=chrome-instant&ie=UTF-8&ion=1#hl=en&sugexp=frglb&gs_nf=1&tok=gIDcolP0S28-Mvznl_n7vm5w&cp=13&gs_id=2&xhr=t&q=marc+randazza&pf=p&scient=psy-ab&rlz=1C1TSNF_enUS419US419&site=webhp&source=hp&oq=marc+randazza&aq=&aqi=&aql=&gs_l=&pbx=1&bav=on.2.or.r_gc.r_f)) for Crystal Cox's brand of crazy to make a dent on his reputation or SEO.

That didn't make Crystal Cox happy. So then she registered JenniferRandazza.com. That's the name of Marc Randazza's wife. Crystal Cox also registered NataliaRandazza.com, the name of Randazza's three year old daughter.

Wait, what? A three year old?! ...WHOA.

That's not just crossing the line, that's taking a giant shit on the line and then setting it on fire while dancing naked on it! You. Just. Don't. Do. That.

Unless, of course, you're Crystal Cox. Then I guess you do that...

In fact, to give you an example of just how sick and twisted Crystal Cox is, this is a PDF of a website (<http://www.popehat.com/wp-content/uploads/2012/03/Marc-Randazza-Blog.-Crystal-Cox-Vs.-Marc-Randazza.-Randazza-Legal-Group-Corbin-Fisher.pdf>) she made about Marc Randazza's wife. See it yourself. That's Crystal Cox's "investigative journalism."

To quote Charlie Murphy, Crystal Cox is a habitual line stepper.

Is this what "freedom of the press" was meant to protect, right...? Extortion and attacking three year olds?

Judge Hernandez said "No. Hell no!" A jury of 12 said "No! Hell no!"

And now I'm saying "No! Hell no!" myself...

Now, you all know my opinion. I'm pretty big on free speech under the First Amendment. If speech makes you mad, counter it with better speech. What I do is kind of sort of akin to journalism.

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But there is a huge difference between blogging, journalism, and outright extortion. And that's what Crystal Cox is – an extortionist. Crystal Cox wants to write a bunch of crap about people and make them pay to take it down as a "reputation manager." And if you don't like that, she will try and ruin your reputation on Google. And when THAT doesn't work, she will go after your wife and three year old daughter. And sadly, Crystal Cox wants to try and hide behind my beloved First Amendment to carry out the scam.

And it ain't right.

But rather than try and silence Crystal Cox, "[s]unlight is said to be the best of disinfectants. . . ." – Justice Louis Brandeis.

So may the sun's light shine brightly and expose the truth for what it is: Crystal Cox is no martyr. She's no journalist. She's not even a blogger. Crystal Cox tried to make a few bucks off extorting people on the internet and calling it "journalism." And she failed – twice. Then, when Crystal Cox didn't get her way, she called Marc Randazza's wife a slut and then went after his 3 year old daughter.

Yes, Crystal Cox is type of woman who picks on 3 year olds when she doesn't get her way. And she wants protection under the law and your sympathies.

Too bad she doesn't deserve it.

Now, Crystal Cox probably figures that no one will expose her bullshit for fear of the same stuff happening to them. But to paraphrase Antonin Pribetic (<http://thetrialwarrior.com>), all things must have an obverse (<http://thetrialwarrior.com/2011/11/07/zen-and-the-art-of-blawing-maintenance/>).

And the obverse to internet extortion is sunshine.

So enjoy some sunshine, Crystal. You've earned it...

Exhibit 2



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Katrina &amp; The Waves - Walking On Sunshine



0:00 / 3:49

[UPDATE]: I incorporated some new stuff based on Popelhat's post. Yes, I continue to steal material from Popelhat without even asking permission. Because that's just how I roll. Snort my taint.

[SECOND UPDATE]: Other (actual) bloggers are reporting Crystal Cox's scam:

Carlos Miller: Blogger Must Act Like Journalist To Be Treated Like One

(<http://www.pixiq.com/article/montana-blogger-must-start-acting-like-a-journalist>)New York Times When Truth Survives Free Speech

([http://www.nytimes.com/2011/12/12/business/media/when-truth-survives-free-speech.html?\\_r=3&pagewanted=all](http://www.nytimes.com/2011/12/12/business/media/when-truth-survives-free-speech.html?_r=3&pagewanted=all))Forbes: Are Bloggers

Really Journalists? Not If They Ask For Money

(<http://www.forbes.com/sites/davidcoursey/2012/03/29/are-bloggers-really-journalists-not-if-they-ask-for-money/>)Defending \_\_\_\_\_ People:

Crystal Cox

(<http://blog.bennettandbennett.com/2012/03/crystal-cox.html>)Legal Satyricon: How Crystal Cox is Proving the Strength of the First Amendment

(<http://randazza.wordpress.com/2012/03/31/how-crystal-cox-is-helping-to-prove-the-strength-of-the-first-amendment/>)The Salty Droid: Crystal Cox :: is not a BLOGGER

(<http://saltydroid.info/crystal-cox-is-not-a-blogger/>)Scott Greenfield: A Blogger Not Like Us

(<http://blog.simplejustice.us/2012/03/30/a-blogger-not-like-us.aspx>)Legal Satyricon: Judge rules, again, that blogger Crystal Cox is not a journalist. You know why? Because she ISN'T a journalist.

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(<http://randazza.wordpress.com/2012/03/30/judge-rules-again-that-blogger-crystal-cox-is-not-a-journalist-you-know-why-because-she-isnt-a-journalist/>)Popehat: "Investigative Journalist" Crystal Cox's Latest Target: An Enemy's Three-Year-Old Daughter  
 (<http://www.popehat.com/2012/03/30/investigative-journalist-crystal-cox-s-latest-target-an-enemy-s-three-year-old-daughter/>)The Fraud Files: "Investigative Journalist" Crystal Cox Attacks Attorney Kevin D. Padrick  
 (<http://www.sequenceinc.com/fraudfiles/2012/03/investigative-journalist-crystal-cox-attacks-attorney-kevin-d-padrick/>)

- What's your marketing doing? <http://en.wordpress.com/about-these-ads/>

- 
- 
- 
- <http://bit.ly/1eDuwsk>

This entry was posted on Friday, March 30th, 2012 at 10:47 PM and is filed under Civil Litigation, Crystal Cox, First Amendment, Marc I. Randazza, Marc Randazza, Straight cash homie. You can follow any responses to this entry through the RSS 2.0 feed. You can leave a response, or trackback from your own site.

## 9 Responses to *Crystal Cox – Investigative Blogger? No, More Like A Scammer and Extortionist*

"Investigative Journalist" Crystal Cox's Latest Target: An Enemy's Three-Year-Old Daughter | Popehat says:  
[March 31, 2012 at 2:27 AM](#)

[...] Crystal Cox – Investigative Blogger? No, More Like A Scammer and Extortionist A Blogger Not Like Us Judge rules, again, that blogger Crystal Cox is not a journalist. You know why? Because she ISN'T a journalist. [...]

Exhibit 25

**Reply****Fraud Files Blog says:**

March 31, 2012 at 11:15 AM

[...] us who want to advance free speech and legitimately criticize the bad acts of bad actors – – but who are really NOT like us. People like Crystal Cox cannot and should not be allowed to lie about people like Kevin Padrick. [...]

**Reply****How Crystal Cox is helping to prove the strength of the First Amendment « The Legal Satyricon says:**

March 31, 2012 at 2:42 PM

[...] the attacks on Kevin Padrick, and shining a light on Cox's widespread extortion scheme, so is Philly Law Blog, and before any of the law blogger community jumped on the bandwagon, Salty Droid was out there all [...]

**Reply****Defending People » Crystal Cox says:**

March 31, 2012 at 3:47 PM

[...] the attacks on Kevin Padrick, and shining a light on Cox's widespread extortion scheme, so is Philly Law Blog, and before any of the law blogger community jumped on the bandwagon, Salty Droid was out there all [...]

**Reply****Crystal Cox – Trial Theory says:**

April 1, 2012 at 8:20 PM

[...] Crystal Cox – Investigative Blogger? No, more like a Scammer and Extortionist [...]

**Reply****A shield law for bloggers? OK, but not for extortionists. | Nobody's Business says:**

April 2, 2012 at 12:35 AM

[...] is known as — yup, you got it — extortion. Cut and dried, [...]

**Reply****New York Times chimes in on the Crystal Cox Story « The Legal Satyricon says:**

April 2, 2012 at 10:20 AM

[...] Crystal Cox – Investigative Blogger? No, More Like A Scammer and Extortionist [...]

**Reply****Fraud Files Forensic Accounting Blog » Crystal Cox Has a History of Seeking Payoffs in Exchange For Retraction says:**

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January 18, 2014 at 5:05 PM

[...] Cox has run this scam more than once. She finds a person or company with whom she disagrees, makes serious false allegations against [...]

Reply

Protecting The Free Speech of Censors: The Crystal Cox Saga | Popelhat says:

January 19, 2014 at 6:25 PM

[...] other lawbloggers — like Jordan Rushie and Scott Greenfield and Mark Bennett and Eric Turkewitz — also pointed out her conduct and [...]

Reply

The Contempt Theme.  
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EXHIBIT 23